

DAVID H. ANGELI, OSB No. 020244
david@angelilaw.com
MICHELLE HOLMAN KERIN, OSB No. 965278
michelle@angelilaw.com
JOANNA PERINI-ABBOTT, OSB No. 141394
joanna@angelilaw.com
ANGELI LAW GROUP LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880

Attorneys for Michael Malekzadeh

WHITNEY PATRICK BOISE, OSB No. 851570
whitney@boisematthews.com
BRIDGET M. DONEGAN, OSB No. 103753
bridget@boisematthews.com
BOISE MATTHEWS DONEGAN LLP
805 SW Broadway, Suite 1900
Portland, OR 97205
Telephone: (503) 228-0487
Facsimile: (503) 227-5984

Attorneys for Bethany Mockerman

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL MALEKZADEH and
BETHANY MOCKERMAN,
Defendant.

Case No. 6:22-cr-00262-MC

**JOINT UNOPPOSED MOTION TO
CONTINUE TRIAL DATE AND
WAIVER OF SPEEDY TRIAL**

Defendants Michael Malekzadeh and Bethany Mockerman, by and through their attorneys, move this Court to continue the trial in this case, currently scheduled for March 29, 2023, for 6 months for a date on or after September 29, 2023, or other time convenient to this Court. The government does not oppose this continuance request.

This is defendants' first motion for a continuance. The continuance is necessary for the parties to continue to investigate the allegations, including working through complex forensic accounting issues and interviewing witnesses. Such work is necessary to adequately defend against the allegations in the case or reach a pre-trial resolution. Any resolution will require extensive negotiations on loss calculations and other nuanced issues that make this continuance necessary.

Defendants continue to fully comply with the receiver of Zadeh Kicks and the government to ensure all assets are safe and can be used to minimize any loss to investors and customers. As the market warrants it, the defendants have agreed to interim sales of assets to ensure the highest value can be recovered. As such, the continuance poses no risk for dissipation of assets.

Counsel for each defendant spoke to defendants and defendants understand their rights under the Speedy Trial Act and Constitution. Defendants consent to waive their right to a speedy trial and agrees that the continuance through September 29, 2023, constitutes excludable delay pursuant to 18 U.S.C. § 3161(h)(7)(A).

DATED this 13th day of March, 2023.

Respectfully submitted,

s/ Joanna Perini-Abbott

MICHELLE HOLMAN KERIN, OSB No. 965278

michelle@angelilaw.com

JOANNA PERINI-ABBOTT, OSB No. 141394

joanna@angelilaw.com

DAVID H. ANGELI, OSB No. 020244

david@angelilaw.com

ANGELI LAW GROUP LLC

121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880

Attorneys for Michael Malekzadeh

s/ Bridget Donegan

BRIDGET M. DONEGAN, OSB No. 103753
bridget@boisematthews.com
WHITNEY PATRICK BOISE, OSB No. 851570
whitney@boisematthews.com
BOISE MATTHEWS DONEGAN LLP
805 SW Broadway
Suite 1900
Portland, OR 97205
Telephone: (503) 228-0487
Facsimile: (503) 227-5984

Attorneys for Bethany Mockerman